

REMARKS

The Office Action dated July 7, 2006, has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1, 2, 6-20 and 24 have been amended to more particularly point out and distinctly claim the subject matter of the invention. Claim 25 has been added. No new matter has been added. Claim 24 is allowed. Claims 1, 2, 6-20 and 25 are submitted for consideration.

Claims 1, 6, 7, 15, 19, and 20 were objected to for containing the phrase “is arranged to.” Claims 1, 6, 7, 15, 19 and 20 have been amended to overcome this objection. Therefore, Applicants request that the objection be withdrawn.

Claim 6 was rejected for reciting “wherein a gatekeeper element” in line 2 of the claim. The Office Action took the position that this phrase does not have proper antecedent basis. Applicants submit that this rejection is improper and traverse the rejection. Specifically, Applicants submit that the recitation of “a gatekeeper,” is proper under antecedent basis issues, *i.e.*, terms are introduced with “a” and subsequently referred to with “said” or “the”. Therefore, Applicants request that this rejection be withdrawn.

Claims 7-10 were objected to as being dependent on a rejected base claim, but would be allowable if rewritten in independent form. Based on the arguments presented

below, Applicants submit that claims 7-10 are allowable in the present form and requests reconsideration of all of the pending claims.

Claims 1, 2, 6, 11, 16, 19, and 20 were rejected under 35 USC §102(e) as being anticipated by U.S. Patent No. 6, 519,235 to Kim (hereinafter Kim). The rejection is traversed as being based on a reference that neither teaches nor suggests the novel combination of features clearly recited in claims 1, 2, 6, 11, 16, 19, and 20 and newly added claim 25.

Claim 1, upon which claims 2 and 6-19 depend, recites a communications system including a network having a first part and a second part. The first and second parts are connected so that a first user in one of the first and second parts can communicate with a second user in the other of the first and second parts. At least the first user is able to move within the respective part of the communication system. The system also includes a gateway for permitting communications between the first and second parts. The gateway includes a register for storing information associating the first and second users and for storing information relating to the current location of the first user so that information from the second user can be directed to first user. The first user is a mobile terminal which is in communication with a base station which is coupled to a respective network element and information relating to the identity of the network element is stored in the register as the current location information of the first user. An identifier allocated in the network element which is configured to receive communications intended for the first user is stored in the register.

Claim 20 recites a communication system including a network including a first part and a second part. The first and second parts are connected so that a first user in one of the first and second parts can communicate with a second user in the other of the first and second parts. The system also includes a gateway element positioned between the first and second parts. The gateway includes a register for storing information associating the first and second users. The gateway is configured to check the source and destination of all information sent between the first and second users in the first and second parts and to permit the information to be passed through the gateway if the source and destination information matches the information stored in the register. The first user includes a mobile terminal in communication with a base station coupled to a respective network element. The information relating to the identity of the network element is stored in the register as the current location information of the first user and an identifier allocated in the network element which is configured to receive communications intended for the first user is stored in the register.

As outlined below, Applicant submits that Kim fails to teach or suggest the elements of claims 1, 2, 6, 11, 16, 19, and 20.

Kim discloses a packet data network for providing a radio packet data service in a mobile radio communication system. The packet data network includes a plurality of radio network controllers (RNCs) for controlling a radio channel allocation to a mobile station and for controlling a path of a packet data service or a circuit data service. The network also includes a plurality of packet data gateway nodes (PDGNS) for performing

management of a mobility of the mobile station and a routing function of packet data for information management. The network further includes a mobile switching center (MSC) for registering and managing terminal node identifiers of the RNCs and the PDGNS connected to the mobile switching center, and for managing and giving to the PDGNS network identification addresses which a user can directly call. The network also includes a packet router for providing a packet data transmission path by routing a packet data between the RNC and PDGN, if a mobile station requests the packet data service. If the mobile station requests the packet data service, a packet router is provided a packet transmission path in association with the RNCs, PDGNS, and MSC or another MSC. See at least the Abstract and Col. 3, line 61-Col. 4, lines 35.

Applicants submit that Kim does not teach or suggest each of the features recited in claims 1, 2, 6, 11, 16, 19, and 20. Each of claims 1, 2, 6, 11, 16, 19, and 20 recites, in part, a gateway for permitting communications between the first and second parts, the gateway includes a register for storing information associating the first and second users and for storing information relating to the current location of the first user so that information from the second user can be directed to first user, wherein the first user is a mobile terminal which is in communication with a base station which is coupled to a respective network element and **information relating to the identity of the network element is stored in the register as the current location information of the first user, an identifier allocated in the network element which is configured to receive communications intended for the first user is stored in the register.** Therefore the

gateway of the present invention is between the two parts of a network with a first user (mobile terminal) in one part of the network and another user in the other part of the network. In the present invention, the gateway has a register which stores information associated with the first and second users, location information of the first user and an identifier is allocated in the network elements which is arranged to receive communications intended for the first user.

The Office Action alleged that figures 2 and 5 and columns 4-6 of Kim teach these features. The arrangement of Kim is a mobile communications network which is arranged to provide a packet data service. The Office Action alleged that the gateway of the presently pending claims is equivalent to the mobile switching center, a packet router, and a packet gateway data node, as disclosed in Kim. Thus, the Office Action equates the gateway of the presently pending claims to three different elements disclosed in Kim. In Kim, the packet gateway data node is described as performing management of mobility of a mobile station and a routing function of packet data. The mobile switching center in Kim is described as registering and managing terminal node identifiers of the radio network controller and the packet gateway data node. The location information for the mobile station is provided to the radio network controller or the packet gateway data node. Kim also describes giving network identification address to the packet gateway data node which a user can directly call.

Applicants submit that there is no teaching or suggestion in Kim of a register in which information relating to the identity of the network element is stored in the register

as the current location information of the first user, as recited in the presently pending claims. Kim also does not teach or suggest that the register stores an identifier allocated to the network element which is configured to receive communications intended for the first user, as recited in the presently pending claims. According to Kim, the mobile switching center registers and manages terminal node identifiers of the radio network controller. However, there is no teaching or suggestion in Kim that information relating to the identity of the radio network controller/network element is stored in the register as the current location information of the first user, as recited in the presently pending claims. There is also no teaching or suggestion in Kim that the radio network controller is configured to receive communications intended for the first user, as recited in the presently pending claims. Kim merely discloses that the radio network controller is used for controlling a radio channel allocation to the mobile station and for controlling a path of a packet data services or a circuit data service. Therefore, Applicants respectfully assert that the rejection under 35 U.S.C. §102(e) should be withdrawn because Kim fails to teach or suggest each feature of claims 1, 2, 6, 11, 16, 19, and 20.

Claims 12-15 were rejected under 35 USC §103(a) over Kim in view of U. S. Patent No. 6,507,589 to Ramasubramani (hereinafter Ramasubramani). According to the Office Action, Kim teaches all of the elements of claims 12-15 except for teaching that the register stores source and destination ports and addresses. Therefore, the Office Action combined Ramasubramani and Kim to yield all of the elements of claims 12-15. The rejection is traversed as being based on references that neither teach nor suggest the

novel combination of features clearly recited in independent claim 1, upon which claims 12-15 are dependent.

Kim and claim 1 have been discussed above. Ramasubramani teaches a communication system for routing between network gateways and service centers. The communication system of Ramasubramani includes a multi-network gateway that is able to couple various wireless carrier networks with different network characteristics to the Internet. The gateway is described as including a push agent and a pull agent that are agents or processing modules within the multi-network gateway that serve to provide wireless communication devices with access to information from the Internet. The push agent operates to "push" information content from the Internet to the wireless communication devices. The pull agent operates to "pull" information content from the Internet when requested by the wireless communication devices. The push and pull agent are coupled to the Internet by an HTTP module and to carrier networks by a wireless carrier interface.

Ramasubramani does not cure the deficiencies of Kim as outlined above. Specifically, Ramasubramani does not teach or suggest a gateway for permitting communications between the first and second parts, the gateway includes a register for storing information associating the first and second users and for storing information relating to the current location of the first user so that information from the second user can be directed to first user, wherein the first user is a mobile terminal which is in communication with a base station which is coupled to a respective network element and

information relating to the identity of the network element is stored in the register as the current location information of the first user, an identifier allocated in the network element which is configured to receive communications intended for the first user is stored in the register, as recited in claim 1 upon which claims 12-15 depend. Therefore, Applicants respectfully assert that the rejection under 35 U.S.C. §103(a) should be withdrawn because neither Kim nor Ramasubramani, whether taken singly or combined, teaches or suggests each feature of claim 1 and hence dependent claims 12-15.

Claims 17 and 18 were rejected under 35 USC §103(a) over Kim in view U. S. Patent No. 6,888,803 to Gentry (hereinafter Gentry). According to the Office Action, Kim teaches all of the elements of claims 17 and 18 except for teaching that the second user operates in accordance with the H.323 protocol and the first user operates in accordance with the GSM standard. Therefore, the Office Action combined Gentry and Kim to yield all of the elements of claims 17 and 18. The rejection is traversed as being based on references that neither teach nor suggest the novel combination of features clearly recited in independent claim 1, upon which claims 17 and 18 are dependent.

Kim is discussed above. Gentry teaches a system for providing wire line telephone services to wireless subscribers utilizing a packet data network. The system includes a base station controller and a base station controller gateway for providing client based services to mobile subscribers and for providing protocol mapping between a mobile protocol and a packet data network protocol. The system of Gentry further includes a mobility gatekeeper for managing network mobility services for each wireless

call including the establishment of a call control path and a speech path between the base station controller and a serving end office telephone point. The system also includes an end office gateway for providing protocol conversion between the packet data network protocol and the end office point data protocol such that a wireless subscriber has access to all wire line services provided by the end office point. A mobile switching center and mobile switching center gateway are included to facilitate inter-system call handoffs into an existing circuit-switched wireless telephony network.

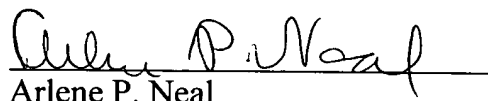
Gentry does not cure the deficiencies of Kim as outlined above. Specifically, Gentry does not teach or suggest a gateway for permitting communications between the first and second parts, the gateway includes a register for storing information associating the first and second users and for storing information relating to the current location of the first user so that information from the second user can be directed to first user, wherein the first user is a mobile terminal which is in communication with a base station which is coupled to a respective network element and information relating to the identity of the network element is stored in the register as the current location information of the first user, an identifier allocated in the network element which is configured to receive communications intended for the first user is stored in the register, as recited in claim 1 upon which claims 17 and 18 depend. Therefore, Applicants respectfully assert that the rejection under 35 U.S.C. §103(a) should be withdrawn because neither Kim nor Gentry, whether taken singly or combined, teaches or suggests each feature of claim 1 and hence dependent claims 17 and 18.

As noted previously, claims 1, 2, 6-20 and 25 recite subject matter which is neither disclosed nor suggested in the prior art references cited in the Office Action. It is therefore respectfully requested that all of claims 1, 2, 6-20 and 25 be allowed and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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Enclosures: Petition for Extension of Time

Additional Claim Fee Transmittal

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